UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

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DEBORAH CHIN, On Behalf of Herself	: Civil Action No. 04-CV-10294-DPW
and All Others Similarly Situated,	: U.S. DISTORT COURT
	: Hon. Douglas P. Woodlock
Plaintiff,	:
	•
v.	•
SONUS NETWORKS, INC., HASSAN	
AHMED, and STEPHEN J. NILL,	
, with 5 x 21 x 121 x 3. 1 x 120,	
Defendants.	
Defendants.	
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Behalf of Itself and All Others Similarly	: Civil Action No. 04-CV-10308-DPW
Situated,	TI D 1 D 2
Situatou,	: Hon. Douglas P. Woodlock
Disingico	
Plaintiff,	
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V.	•
SOMIC METWODICS INC. BALL S	•
SONUS NETWORKS, INC., PAUL R.	•
JONES, EDWARD N. HARRIS, J.	:
MICHAEL O'HARA, HASSAN M.	:
AHMED and STEPHEN J. NILL,	
	:
Defendants.	

MOTION OF PLAINTIFF SAVERIO PUGLIESE FOR CONSOLIDATION AND FOR APPOINTMENT OF LEAD PLAINTIFF, LEAD COUNSEL AND LIAISON COUNSEL

MICHELLE TREBITSCH, On Behalf of Herself and All Others Similarly Situated, Plaintiff, V. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. PETER KALTMAN, Individually and On Behalf of All Others Similarly Situated, Plaintiff, V. SONUS NETWORKS, INC., HASSAN : AHMED, and STEPHEN J. NILL, Defendants. PETER KALTMAN, Individually and : SONUS NETWORKS, INC., HASSAN : AHMED, and STEPHEN J. NILL, Defendants. SONUS NETWORKS, INC., HASSAN : AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on Behalf of All Others Similarly Situated, Civil Action No. 04-CV-10310-DPW	
Herself and All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. PETER KALTMAN, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on Civil Action No. 04-CV-10310-DPM	V
Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. PETER KALTMAN, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on Civil Action No. 04-CV-10310-DPM	• .
Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. PETER KALTMAN, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on Civil Action No. 04-CV-10310-DPM	
v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. PETER KALTMAN, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on Civil Action No. 04-CV-10309-DPW Hon. Douglas P. Woodlock Civil Action No. 04-CV-10310-DPW	
v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. PETER KALTMAN, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on Civil Action No. 04-CV-10309-DPW Hon. Douglas P. Woodlock Civil Action No. 04-CV-10310-DPW	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. PETER KALTMAN, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on Civil Action No. 04-CV-10309-DPW Civil Action No. 04-CV-10310-DPW	
SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. PETER KALTMAN, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on Civil Action No. 04-CV-10309-DPW Civil Action No. 04-CV-10310-DPW	
AHMED, and STEPHEN J. NILL, Defendants. PETER KALTMAN, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on Civil Action No. 04-CV-10310-DPW Civil Action No. 04-CV-10310-DPW	
AHMED, and STEPHEN J. NILL, Defendants. PETER KALTMAN, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on Civil Action No. 04-CV-10310-DPW Civil Action No. 04-CV-10310-DPW	
Defendants. PETER KALTMAN, Individually and On Behalf of All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on Civil Action No. 04-CV-10309-DPW Hon. Douglas P. Woodlock : : : : : : : : : : : : : : : : : :	
PETER KALTMAN, Individually and On Behalf of All Others Similarly Situated, Plaintiff, V. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on Civil Action No. 04-CV-10309-DPW Hon. Douglas P. Woodlock SCIVIL Action No. 04-CV-10310-DPW Civil Action No. 04-CV-10310-DPW	
PETER KALTMAN, Individually and On Behalf of All Others Similarly Situated, Plaintiff, V. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on Civil Action No. 04-CV-10309-DPW Hon. Douglas P. Woodlock SCIVIL Action No. 04-CV-10310-DPW Civil Action No. 04-CV-10310-DPW	
On Behalf of All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on Civil Action No. 04-CV-10310-DPW	•
On Behalf of All Others Similarly Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on Civil Action No. 04-CV-10310-DPW	
Situated, Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on Civil Action No. 04-CV-10310-DPW	Į.
Plaintiff, v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on Civil Action No. 04-CV-10310-DPW	
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v. SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on Civil Action No. 04-CV-10310-DPW	
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SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on Civil Action No. 04-CV-10310-DPW	
AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on : Civil Action No. 04-CV-10310-DPW	
AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on : Civil Action No. 04-CV-10310-DPW	
AHMED, and STEPHEN J. NILL, Defendants. SAMANTHA DEN, Individually and on : Civil Action No. 04-CV-10310-DPW	
Defendants. : : : : : : : : : : : : : : : : : : :	
SAMANTHA DEN, Individually and on : Civil Action No. 04-CV-10310-DPW	
SAMANTHA DEN, Individually and on : Civil Action No. 04-CV-10310-DPW	
SAMANTHA DEN, Individually and on Behalf of All Others Similarly Situated, : Civil Action No. 04-CV-10310-DPW	
Behalf of All Others Similarly Situated, :	-
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Hon. Douglas P. Woodlock	
Plaintiff, :	
 	
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SONUS NETWORKS, INC., HASSAN :	
AHMED, and STEPHEN J. NILL,	
:	
Defendants. :	

DICHARD CURTIC DATE		
RICHARD CURTIS, on Behalf of	:	Civil Action No. 04-CV-10314-MLW
Himself and All Others Similarly	:	
Situated,	:	Hon. Mark L. Wolf
	:	
Plaintiff,	:	
	:	
v.		
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	•	
Turners, and STETTIEN J. MILL,	•	
	:	
	:	
Defendants.	:	
	:	
RONALD KASSOVER, on Behalf of	:	Civil Action No. 04-CV-10329-DPW
Himself and All Others Similarly	:	
Situated,	:	Hon. Douglas P. Woodlock
	•	110111 2 Ouglas I. Woodlock
Plaintiff,	•	
1 10011111,		
v.	•	
	•	
SONUS NETWORKS, INC., HASSAN	i	
AUMED and CTEDITED I DITE	:	
AHMED, and STEPHEN J. NILL,	:	
	: .	
Defendants.	:	
STEVE L. BAKER, Individually and on	:	Civil Action No. 04-CV-10333-DPW
Behalf of All Others Similarly Situated,	:	
	:	Hon. Douglas P. Woodlock
Plaintiff,	:	
v.		
SONUS NETWORKS, INC., HASSAN		
AHMED and STEDUEN I NIII I	:	
AHMED, and STEPHEN J. NILL,	:	
	;	
Defendants.	:	
	:	
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MICHAEL KAFFEE, on Behalf of	:	Civil Action No. 04-CV-10345-DPW
Himself and All Others Similarly	:	
Situated,	:	Hon. Douglas P. Woodlock
71	:	
Plaintiff,	:	
	:	
V.	:	
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	
and STEITIEN J. INILL,		
Defendants.	:	
HAIMING HU, Individually and on	•	Civil Action No. 04 CV 1024C DDVI
Behalf of All Others Similarly Situated,	:	Civil Action No. 04-CV-10346-DPW
- service of the carety billiance,		Hon. Douglas P. Woodlock
Plaintiff,		11011. Douglas F. Woodlock
	•	
v.		
	:	
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	
	:	
Defendants.	:	
	:	
CHARLES STARBUCK, Individually	:	Civil Action No. 04-CV-10362-DPW
and on Behalf of All Others Similarly	:	
Situated,	:	Hon. Douglas P. Woodlock
D1 : (*66	:	
Plaintiff,	:	
v.	:	
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SONUS NETWORKS, INC., HASSAN		
AHMED, and STEPHEN J. NILL,		
, was officially stately,		
Defendants.		
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CARETTEE TIO T 41 11		
SAMUEL HO, Individually and on	:	Civil Action No. 04-CV-10363-DPW
Behalf of All Others Similarly Situated,	:	
	:	Hon. Douglas P. Woodlock
Plaintiff	:	
	:	
V.	:	
	:	
SONUS NETWORKS, INC., HASSAN	:	
AHMED, and STEPHEN J. NILL,	:	
	:	
Defendants.	:	
	:	
	:	
JEFFREY C. RODRIGUES, Individually	:	Civil Action No. 04-CV-10364-DPW
and on Behalf of All Others Similarly	:	10304-DI W
Situated,	:	Hon. Douglas P. Woodlock
		110m Douglas I. Woodlock
Plaintiff,		
· · · · · · · · · · · · · · · · · · ·	•	
v.		
SONUS NETWORKS, INC., HASSAN		
AHMED, and STEPHEN J. NILL,		
,		
Defendants.		
	.	•
ROBERT CONTE and MARK	•	Civil Action No. 04-CV-10382-DPW
RESPLER, On Behalf of Themselves and		CIVII ACHOII NO. 04-CV-10382-DPW
all Others Similarly Situated,	.	Hon Dongles D. Woodlests
Diministry Diministry		Hon. Douglas P. Woodlock
Plaintiff	:	•
1 Idintill		
v.		
	:	
SONUS NETWORKS, INC., HASSAN		
AHMED, and STEPHEN J. NILL,	•	
ZILIVIED, AND STEFFICH J. NILL,	:	
D = C . 1	:	
Defendants.	:	
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WHEATON ELECTRICAL SERVICES	:	Civil Action No. 04-CV-10383-DPW
RETIREMENT 401K PROFIT	:	
SHARING, On Behalf of Itself and All	:	Hon. Douglas P. Woodlock
Others Similarly Situated,	:	
	:	
Plaintiff,	 :	
v.	:	
SONUS NETWORKS, INC., HASSAN		
AHMED, and STEPHEN J. NILL,		
Taranto, and Distilled J. MILL,	•	
	:	
D.C. 1	:	
Defendants.		
BRIAN CLARK, On Behalf of Himself	:	Civil Action No. 04-CV-10454-DPW
and All Others Similarly Situated,	:	
	:	Hon. Douglas P. Woodlock
Plaintiff,	:	
	:	
v.	:	
	•	
SONUS NETWORKS, INC., PAUL R.		
JONES, EDWARD N. HARRIS, J.		
MICHAEL O'HARA, HASSAN M.	:	
AHMED and STEPHEN J. NILL.	•	
AMERICA AND STEP MEN J. NILL,	•	
	:	
D.C.	:	
Defendants.		
SHEILA BROWNWELL, On Behalf of	:	Civil Action No. 04-CV-10597-DPW
Herself and All Others Similarly	:	
Situated,	:	Hon. Douglas P. Woodlock
	:	
Plaintiff,	:	
	:	
v.		
SONUS NETWORKS, INC., HASSAN		
AHMED, and STEPHEN J. NILL,		
, and other rest,		
	:	
	:	
Defendants.	:	
SAVERIO PUGLIESE, On Behalf of	:	Civil Action No. 04-CV-10612-DPW
Himself and All Others Similarly	:	
Situated,	:	Hon. Douglas P. Woodlock
	:	Ome = : I valoud
Plaintiff,	:	
	.	
v.		
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SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,	•	
	:	
	:	
Defendants.	:	
DAVID V. NOCITO, On Behalf of	:	Civil Action No. 04-CV-10623-DPW
Himself and All Others Similarly	:	
Situated,	:	Hon. Douglas P. Woodlock
	:	
Plaintiff,	 :	· ·
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v.	:	
	:	
SONUS NETWORKS, INC., HASSAN	\:	
AHMED, and STEPHEN J. NILL,	1:	
	.	
Defendants.		

PLEASE TAKE NOTICE that pursuant to Rule 42(a) of the Federal Rules of Civil Procedure and Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 ("PSLRA"), Plaintiff Saverio Pugliese ("Pugliese") will move this Court, at a time and place to be determined later, for an Order:

- (1) consolidating the above-captioned related actions filed on behalf of the purchasers of Sonus Networks, Inc. common stock;
- (2) appointing Pugliese as Lead Plaintiff in the above related actions under Section 21(D)(a)(3)(B) of the PSLRA; and
- (3) approving Pugliese's selection of Zwerling, Schachter & Zwerling, LLP as Lead Counsel and Berman DeValerio Pease Tabacco Burt & Pucillo as Liaison Counsel.

This motion is supported by the accompanying Memorandum of Law in Support of Motion of Plaintiff Saverio Pugliese for Consolidation and for Appointment of Lead Plaintiff, Lead Counsel and Liaison Counsel, the Affidavit of Richard Speirs in Support of Motion of Plaintiff Saverio Pugliese for Consolidation and for Appointment of Lead Plaintiff, Lead Counsel and Liaison Counsel together with the exhibits attached thereto, the [Proposed] Order Consolidating the Actions, Appointing Plaintiff and Saverio Pugliese Lead Plaintiff and Approving Lead Plaintiff's Choice of Lead Counsel and Liaison Counsel, all of the prior pleadings and proceedings had herein, and such other written and/or oral argument, as may be presented to the Court.

Dated: Boston, MA April 12, 2004

Respectfully submitted,

BERMAN DEVALERIO PEASE TABACCO BURT & PUCILLO

Proposed Liaison Counsel for the Class

ZWERLING, SCHACHTER & ZWERLING, LLP

Richard A. Speirs Kevin M. McGee 845 Third Avenue New York, NY 10022 Phone: (212) 223-3900

Fax: (212) 371-5969

Proposed Lead Counsel for the Class